

September 23, 2004

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SEP 24 2004

PUBLIC SERVICE  
COMMISSION

Ms. Elizabeth O'Donnell  
Executive Director  
Public Service Commission of Kentucky  
211 Sower Boulevard  
Frankfort, KY 40601

Re: Case No. 2004-00319

Dear Ms. O'Donnell:

Enclosed please find the original and ten (10) copies of the Kentucky Cable Television Association's Motion to Intervene in the above numbered case. In addition, I have enclosed an additional copy of the first page which we request be file stamped and returned in the enclosed envelope.

Thank you for your attention to this matter.

Very truly yours,

WYATT, TARRANT & COMBS, LLP



Frank F. Chuppe

FFC/peh  
Enclosures  
20230717.1

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

APPLICATION OF JACKSON PURCHASE )  
ENERGY CORPORATION FOR )  
ADJUSTMENTS IN EXISTING CABLE )  
TELEVISION ATTACHED TARIFF )

CASE NO. 2004-00319

**KENTUCKY CABLE TELECOMMUNICATIONS  
ASSOCIATION'S MOTION FOR FULL INTERVENTION**

Pursuant to 807 KAR 5:001, Section 3 and 5:011, Section 8, the Kentucky Cable Telecommunications Association (KCTA) moves to intervene in the above-referenced proceeding. KCTA is a non-profit organization consisting over more than one hundred cable systems serving the majority of cable television customers throughout Kentucky. Three of its members, Comcast Cablevision of Paducah, Inc., Mediacom Communications Corporation, and Charter Communications are utility customers of Jackson Purchase Energy Corporation ("Jackson Purchase") (i.e., attach to Jackson Purchase's utility poles). These three KCTA members are the Jackson Purchase customers most directly affected by Jackson Purchase's Petition herein. Therefore KCTA should have the right to be heard on the issue of a proposed increase of Jackson Purchase's pole attachment and anchor attachment rates. KCTA seeks full intervention pursuant to 807 KAR 5:001, Sec. 3 (8) to allow it to fully participate as a party and to be served with documents related to Jackson Purchase's filing.

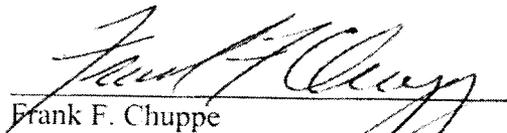
KCTA and Jackson Purchase were recently the participants in a proceeding before the Kentucky Public Service Commission ("Commission") relating, inter alia, to the correct

definition of "pole attachment."<sup>1</sup> The Commission permitted KCTA's participation on behalf of the three cable companies named herein in that proceeding, which proceeding resulted in a Settlement Agreement approved by the Commission on October 21, 2003.<sup>2</sup> KCTA pledges to adhere to all Commission rules and procedures applicable to it as a party intervenor in the proceeding.

WHEREFORE, KCTA moves the Commission for full intervention in the above-referenced proceeding.

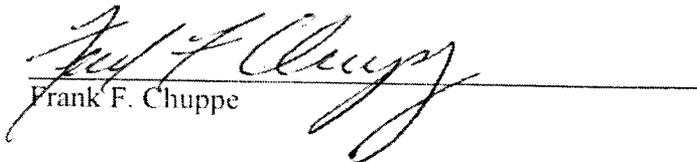
Respectfully submitted,

Gardner F. Gillespie  
HOGAN & HARSTON, L.L.P.  
555 Thirteenth Street  
Washington, DC 20004-1109

  
\_\_\_\_\_  
Frank F. Chuppe  
WYATT, TARRANT & COMBS, LLP  
500 West Jefferson Street, Suite 2600  
Louisville, KY 40202  
(502) 562-7336

**CERTIFICATE OF SERVICE**

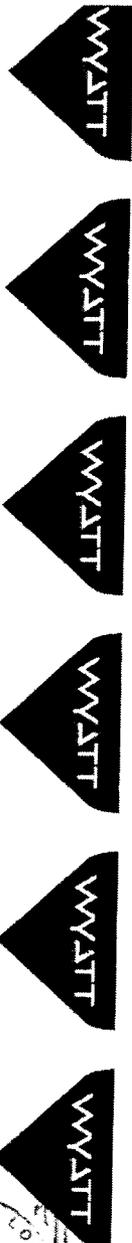
The undersigned hereby certifies that a copy of the foregoing was served upon Frank N. King, Jr., Dorsey, King, Gray, Norment & Hopgood, 318 Second Street, Henderson, KY 42420 and to the Attorney General of Kentucky, Office of Rate Intervention, 1024 Capital Center Drive, Frankfort, KY 40601 U.S. Mail, first class postage prepaid, this 23 day of September, 2004.

  
\_\_\_\_\_  
Frank F. Chuppe

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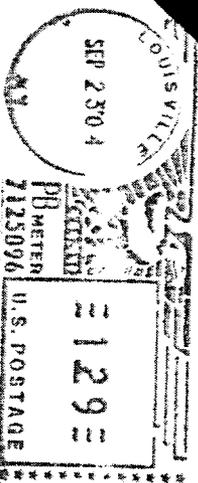
<sup>1</sup> See Case No. 2003-0056.

<sup>2</sup> Jackson Purchase did not object to KCTA's participation in that proceeding on behalf of its members.



TARRANT & COMBS, LLP

500 West Jefferson Street, Suite 2800  
Louisville, Kentucky 40202-2898



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